

1 HUB LAW OFFICES
Ford Greene, Esquire
2 California State Bar No. 107601
711 Sir Francis Drake Boulevard
3 San Anselmo, California 94960-1949
Telephone: (415) 258-0360

4 PAUL MORANTZ, ESQ.
5 P.O. Box 511
Pacific Palisades, CA 90272
6 (310) 459-4745

7 Attorney for Defendants
GERALD ARMSTRONG and
8 THE GERALD ARMSTRONG CORPORATION

30
ORIGINAL FILED

FEB 19 1993

LOS ANGELES
SUPERIOR COURT

RECEIVED

FEB 19 1993

HUB LAW OFFICES

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 IN AND FOR THE COUNTY OF LOS ANGELES

13 CHURCH OF SCIENTOLOGY)
14 INTERNATIONAL, a California)
not-for-profit religious)
15 corporation;)
16 Plaintiffs,)
17 vs.)
18 GERALD ARMSTRONG; DOES 1)
through 25, inclusive,)
19 Defendants.)

No. BC 052 395

DECLARATION OF FORD GREENE
IN FURTHER SUPPORT OF
DEFENDANTS' OPPOSITION TO
MOTION TO COMPEL

Date: February 19, 1993
Time: 8:30 a.m.
Dept: 30

Discovery Cut Off: None
Motion Cut-Off: None
Trial Date: May 3, 1993

22 FORD GREENE declares:

23 1. I am an attorney licensed to practice law in the Courts
24 of the State of California and am the attorney of record for
25 GERALD ARMSTRONG and THE GERALD ARMSTRONG CORPORATION, defendants
26 herein.

27 2. In its reply brief concerning the instant motion,
28

COPY

1 plaintiff CHURCH OF SCIENTOLOGY OF CALIFORNIA ("Scientology") has
2 asserted that on October 8, 1992 I stipulated to extend the time
3 within which Scientology could bring a motion to compel Mr.
4 Armstrong to further answer certain deposition questions. This is
5 incorrect and inaccurate.

6 3. During Scientology's depositions of Mr. Armstrong
7 Scientology's counsel and I have consistently agreed to the
8 following stipulations. Those stipulations were:

9
10 a. That Mr. Armstrong would not be required to go to the
11 Court Reporter's office in order to review and correct the
12 transcript of each session of his deposition; and

13 b. That Scientology could be the custodian of the original
14 deposition transcript.

15

16 At Mr. Armstrong's first deposition session on June 24, 1992,
17 it was agreed as follows:

18

19 MR. GREENE: Let me interrupt you just for a second.
20 For the record, we've agreed that as to the sessions, or at
21 least as to this session of Mr. Armstrong's deposition, when
22 the reporter has completed the transcription of the original,
23 it will be sent care of me to Mr. Armstrong; he will make his
24 corrections and then return it directly to Bowles, B-O-W-L-E-
25 S [and Moxon].

26

27 MS. BARTILSON: And we'll retained [sic] custody of the
28 original. That's fine.

28

1 (5:10-18 of Excerpts of Deposition of Gerald Armstrong taken June
2 24, 1992, a true and correct copy of which is attached hereto and
3 incorporated herein as Exhibit A)
4

5 At Mr. Armstrong's second deposition session on July 24,
6 1992, the same stipulations applied as follows:
7

8 MR. WILSON: This is a continuation of the deposition
9 of Gerald Armstrong from June 24, and we'll have the same
10 stipulations that we had at the previous deposition, and Mr.
11 Armstrong is under oath from that previous deposition.
12

13 (182:2-6 of Excerpts of Deposition of Gerald Armstrong taken July
14 22, 1992, a true and correct copy of which is attached hereto and
15 incorporated herein as Exhibit B)
16

17 At Mr. Armstrong's third deposition session on October 7,
18 1992 the same stipulations applied (except that the original no
19 longer would be sent to Mr. Armstrong) as follows:
20

21 MR. GREENE: And we ask in this deposition that the
22 same stipulations apply that we had previously; that
23 objections are reserved, and the original will be mailed to
24 Armstrong for his corrections, but then it will go directly
25 back to your office.
26

27 MS. BARTILSON: I do have one problem with the
28 second part. I was discussing this with the court reporter
earlier.

1 They have a policy that if the original goes to the
2 deponent for signature and the deponent does not order a copy
3 of the deposition, they'll charge me for two copies, on the
4 theory that you will take a copy of the original.

5 So, if you agree now to order a copy from the court
6 reporter, and you do that, then it's fine to send the
7 original to Mr. Armstrong for signature. Otherwise, I will
8 have to ask him to go to the court reporter's office to sign.

9
10 (299:13-300:25 of Excerpts of Deposition of Gerald Armstrong taken
11 October 7, 1992, a true and correct copy of which is attached
12 hereto and incorporated herein as Exhibit C)

13
14 At the fourth session of Mr. Armstrong's deposition, I agreed
15 to the same stipulations as had been entered into at the previous
16 three sessions, that is that Mr. Armstrong would be excused from
17 going to the court reporter's office in order to review and
18 correct the transcript of his deposition. The full text of this
19 discussion is as follows:

20
21 MS. BARTILSON: Q. Subject to the motions to
22 compel -- or motion to compel that has been made necessary by
23 some of the objections raised in all the different sessions
24 of your deposition, and subject to the possibility that some
25 of the -- I won't say that. Never mind.

26 Subject to the motion to compel, I think I'm ready
27 to conclude your deposition on behalf of plaintiff in this
28 case, Church of Scientology International.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Now, do you want a stipulation or not.

MR. GREENE: Let's see.

Yes. I just want to have the stipulation that a copy that we obtain will suffice for review purposes so that Mr. Armstrong need not sally forth to your office, Madame Court Reporter, to conduct a review.

MS. BARTILSON: So the court reporter will send you a copy of the deposition?

MR. GREENE: Correct.

MS. BARTILSON: Which he may review?

MR. GREENE: Right.

MS. BARTILSON: How long does he want?

MR. GREENE: Standard time. Thirty days.

MS. BARTILSON: And copies of the deposition, in the meantime, can be used for any purposes and corrected copies can be used for any purposes in this litigation?

MR. GREENE: No, I won't stipulate that copies can be used without limitation for any purpose, because without him having had a chance to review it, I won't do that.

MS. BARTILSON: Once he reviewed it.

MR. GREENE: Yes, of course. The corrections.

MS. BARTILSON: The corrections, once you have completed them, you will forward the corrections to me as I will be the custodian of the original transcript and the corrections.

MR. GREENE: Yes, that's fine.

MS. BARTILSON: And a corrected transcript can be used for any purposes in this litigation.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

MR. GREENE: Yeah.

MS. BARTILSON: So stipulated.

(521:22-523:13 of Excerpts of Deposition of Gerald Armstrong taken October 8, 1992, a true and correct copy of which is attached hereto and incorporated herein as Exhibit D)

4. As reflected above, at no time did I ever stipulate to extend the time within which to bring a motion to compel further responses to Mr. Armstrong's deposition sessions, or to extend the time within which to move to compel the production of any documents. As had been for all of Mr. Armstrong's deposition sessions, my intent was to prevent Armstrong from having to conduct his review in the court reporter's office, and to avoid Scientology's use of the deposition "without limitation for any purpose" without further definition of specifically what Scientology had in mind. At no time was it my intent, nor did I even consider extending the time limits imposed by Code of Civil Procedure section 2025 (o).

Under penalty of perjury pursuant to the laws of the State of California I hereby declare that the foregoing is true and correct according to my first-hand knowledge, except those matters stated to be on information and belief, and as to those matters, I believe them to be true.

Executed on February 19, 1993, at San Anselmo, California



FORD GREENE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN AND FOR THE SUPERIOR COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

--oOo--

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation,

Plaintiff,

vs.

Case No. BC 052395

GERALD ARMSTRONG; DOES 1
through 25, inclusive,

Defendants.

ORIGINAL

RECEIVED

JUL 10 1992

HUB LAW OFFICES

DEPOSITION OF

GERALD ARMSTRONG

Wednesday, June 24, 1992

REPORTED BY: SUSAN M. SKIGEN, CSR #5829

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

EXAMINATION BY:

PAGE

MR. WILSON

5

---oOo---

E X H I B I T S

PLAINTIFF'S FOR IDENTIFICATION

DESCRIPTION

PAGE

No. 1	Letter to Andrew H. Wilson, Esq, from Gerald Armstrong, dated June 20, 1992	7
No. 2	Two-page letter to Andrew H. Wilson, Esquire, from Gerald Armstrong, dated June 20, 1992	7
No. 3	Fax cover sheet and letter to Andrew H. Wilson, Esq. from Gerald Armstrong, dated June 19, 1992	7
No. 4	Amended Notice of Taking the Deposition of Defendant Gerald Armstrong	7
No. 5	Civil Subpoena and attached Notice of Taking Deposition of the Gerald Armstrong Corporation	7
No. 6	Document entitled Mutual Release of All Claims and Settlement Agreement	149

---oOo---

IN AND FOR THE SUPERIOR COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

--oOo--

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation,

Plaintiff,

vs.

Case No. BC 052395

GERALD ARMSTRONG; DOES 1
through 25, inclusive,

Defendants.

_____ /

BE IT REMEMBERED on Wednesday, June 24,
1992, commencing at 10:20 a.m. thereof, at the Law
Offices of WILSON, RYAN & CAMPILONGO, 235 Montgomery
Street, Suite 450, San Francisco, California 94104,
before me, SUSAN M. SKIGEN, Certified Shorthand Reporter
No. 5829 for the State of California, personally
appeared

GERALD ARMSTRONG,

called as a witness, who having been first duly sworn,
was examined and interrogated as hereinafter set forth.

--oOo--

A P P E A R A N C E S

LAW OFFICES OF WILSON, RYAN & CAMPILONGO,
235 Montgomery Street, Suite 450, San Francisco,
California, 94104, represented by ANDREW H. WILSON,
Attorney at Law, appeared as counsel on behalf of the
Plaintiff.

LAW OFFICES OF BOWLES & MOXON, 6255 Sunset
Boulevard, Suite 2000, Hollywood, California 90028,
represented by LAURIE J. BARTILSON, Attorney at Law,
appeared as counsel on behalf of the Plaintiff.

FORD GREENE, Attorney at Law, 711 Sir
Francis Drake Boulevard, San Anselmo, California 94960,
appeared as counsel on behalf of the Defendant.

ALSO PRESENT: Matt Ward, Paralegal, Law
Offices of Wilson, Ryan & Campilongo.

--oOo--

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EXAMINATION BY MR. WILSON

1
2 MR. WILSON: Q. Mr. Armstrong, as you know
3 my name is Andy Wilson and I'm representing the Church
4 of Scientology International in the action that's been
5 filed against you originally in Marin County,
6 transferred to Los Angeles.

7 I know that you've had your deposition
8 taken before; is that correct?

9 A. Yes.

10 MR. GREENE: Let me interrupt you just for
11 a second. For the record, we've agreed that as to the
12 sessions, or at least this session of Mr. Armstrong's
13 deposition, when the reporter has completed the
14 transcription of the original, it will be sent care of
15 me to Mr. Armstrong; he will make his corrections and
16 then return it directly to Bowles, B-o-w-l-e-s.

17 MS. BARTILSON: And we'll retained custody
18 of the original. That's fine.

19 MR. WILSON: Q. I'm going to shorten my
20 customary preamble.

21 As you know, and as Ms.
22 Bartilson and Mr. Greene just discussed, when the
23 questions and answers are transcribed, they'll be put in
24 booklet form and sent to Mr. Greene as he described.

25 When that happens, you'll have an

1 opportunity to make any changes that you feel are
2 necessary to correct your testimony.

3 However, if the deposition is used at
4 trial, I'll be able to comment on the changes that you
5 do make.

6 It's important that the record that we
7 create here be clear, so it's important that you answer
8 audibly with words as opposed to gestures or sounds so
9 that the record will be clear.

10 It's also important that you and I not talk
11 at the same time. So you should wait until I finish my
12 questions before you begin your answers and I will wait
13 till you finish your answers before I ask my next
14 question.

15 Do you understand those grounds rules so
16 far?

17 A. Yes.

18 Q. Is there any reason that you can not
19 testify here today?

20 A. There are reasons why I should not, but
21 there aren't any reasons why I cannot.

22 Q. Are you under the influence of any drugs or
23 medication which affect your memory?

24 A. No.

25 Q. Do you recall sending me several letters

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

--oOo--

COPY

CHURCH OF SCIENTOLOGY INTERNATIONAL,
a California not-for-profit religious
corporation,

Plaintiff,

vs.

No. BC 052395

GERALD ARMSTRONG; DOES 1 through 25,
inclusive,

Defendants.

RECEIVED

AUG 21 1992

HUB LAW OFFICES

DEPOSITION OF

GERALD ARMSTRONG

Wednesday, July 22, 1992

Volume II, Pages 179 - 293

REPORTED BY: KATHERINE NG, CSR NO. 6350

I N D E X

<u>EXAMINATION BY:</u>	<u>PAGE</u>
MR. WILSON:	182

--oOo--

E X H I B I T S

<u>PLAINTIFF'S FOR IDENTIFICATION</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
No. 7	16-page declaration by Gerald Armstrong	182
No. 8	Two-page Supporting Declaration of Gerry Armstrong to Defendants' and Counter-Claimants' Opposition to Plaintiffs' and Counter-Defendants' Motion for Protective Order Re Fifth Request for Production of Documents or Things and For Sanctions	219

--oOo--

1 BE IT REMEMBERED that on Wednesday, July 22,
2 1992, commencing at 9:30 a.m., thereof, at the Law
3 Offices of WILSON, RYAN & CAMPILONGO, 235 Montgomery
4 Street, Suite 450, San Francisco, California 94105,
5 before me, KATHERINE L. NG, a Certified Shorthand
6 Reporter in and for the State of California, personally
7 appeared

8 GERALD ARMSTRONG,

9 called as a witness who, having been previously sworn,
10 was examined and testified as follows:

11 --oOo--

12
13
14
15 A P P E A R A N C E S

16
17 WILSON, RYAN & CAMPILONGO, 235 Montgomery
18 Street, Suite 450, San Francisco, California 94105,
19 represented by ANDREW WILSON, Attorney at Law, appeared
20 as counsel on behalf of the Plaintiff.

21 HUB LAW OFFICES, 711 Sir Francis Drake
22 Boulevard, San Anselmo, California 94960, represented by
23 FORD GREENE, Attorney at Law, appeared as counsel on
24 behalf of the Defendant.

25 ALSO PRESENT: MATTHEW WARD.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
---oOo---

MR. WILSON: This is a continuation of the deposition of Gerald Armstrong from June 24, and we'll have the same stipulations that we had at the previous deposition, and Mr. Armstrong is under oath from that previous deposition.

(Plaintiff's Exhibit 7 was marked.)

MR. WILSON: We have marked for identification Exhibit 7, a declaration of Gerald Armstrong dated June 16, 1991.

----oOo----

EXAMINATION BY MR. WILSON

MR. WILSON: Q. Mr. Armstrong, do you recognize what I have had marked as Exhibit 7?

A. Yes.

Q. Can you tell me what it is?

A. It is a declaration which I executed on July 16, 1991.

Q. Who drafted it?

A. I did.

Q. And do you know what case it was filed in?

A. Not for sure, no.

Q. Can you tell me what case you believe it was filed in?

A. Azneran.

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF MARIN

--oOo--

CHURCH OF SCIENTOLOGY)
INTERNATIONAL, a California)
not-for-profit religious)
corporation,)
Plaintiff,)
vs.)
GERALD ARMSTRONG; DOES 1-25,)
inclusive,)
Defendants.)

**CERTIFIED
COPY**

No. BC 052395

**RECEIVED
OCT 26 1992
HUB LAW OFFICES**

DEPOSITION OF
GERALD ARMSTRONG

Volume III

October 7, 1992

REPORTED BY: LARRY BOSTOW, CSR# 5941

I N D E X

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EXAMINATION BY:

PAGE

MS. BARTILSON:

298

EXHIBITS

PLAINTIFF'S FOR

IDENTIFICATION

DESCRIPTION

PAGE

9	Armstrong declaration, 7/16/91	312
10	Armstrong affidavit, 12/6/86	319
11	"Declaration of Gerald Armstrong in Opposition to Motion to Exclude Expert Testimony" in <u>Aznaran v. Church of Scientology of California</u> , and attachments	322
12	"Declaration of Gerald Armstrong Regarding Alleged 'Taint' of Joseph A. Yanny, Esquire," in <u>Aznaran v. Church of Scientology of California</u> , and attachments	329
13	Document headed "Where: Marin Superior Court"	338
14	Armstrong affidavit, 2/19/92, and attachment	390

--oOo--

1 BE IT REMEMBERED that on Wednesday, October
2 7, 1992, commencing at 10 a.m. thereof, at 235 Montgomery
3 Street, Suite 450, San Francisco, California, before me,
4 LARRY BOSTOW, a Certified Shorthand Reporter in and for
5 the State of California, personally appeared

6 GERALD ARMSTRONG,

7 who, having been first duly sworn, was examined and
8 testified as follows:

9 --oOo--

10
11
12 BOWLES & MOXON, 6255 Sunset Boulevard, Suite
13 2000, Hollywood, California 90028, represented by LAURIE
14 J. BARTILSON, Attorney at Law, appeared as counsel on
15 behalf of the Plaintiff.

16
17 HUB LAW OFFICES, 711 Sir Francis Drake
18 Boulevard, San Anselmo, California 94960, represented by
19 FORD GREENE, Attorney at Law, appeared as counsel on
20 behalf of the Defendants.

21
22 Also present: Mathew Ward.

23
24 --oOo--

25

EXAMINATION BY MS. BARTILSON

1
2 MS. BARTILSON: Q. Mr. Armstrong, you
3 understand this is a continuation of your deposition
4 that's already been started in this case by Mr. Wilson;
5 is that correct?

6 A. Right.

7 Q. Do you have any difficulty hearing me with
8 the noise of the street?

9 MR. GREENE: Yes.

10 MS. BARTILSON: Maybe we could close the
11 window.

12 MR. GREENE: Either that or if we could just
13 speak up. I mean, this room has no circulation.

14 MS. BARTILSON: I have a sore throat, so I'm
15 not sure I'm going to be able to holler too loud.

16 But don't close it all the way.

17 THE WITNESS: It would be my preference
18 to --

19 MS. BARTILSON: Don't close it all the way.
20 Leave it open a little bit.

21 THE WITNESS: -- close it.

22 MS. BARTILSON: I'll do my best to speak up,
23 but I am hoarse this morning for some reason.

24 MR. GREENE: Okay.

25 MS. BARTILSON: Q. If at any time you have

1 difficulty hearing me and you don't understand the
2 question, please ask me to repeat it.

3 A. Okay.

4 Q. You've been deposed many times before, have
5 you not, Mr. Armstrong?

6 A. Yes.

7 Q. So I will not repeat for you the admonitions
8 that I normally would for a witness.

9 You understand that you are under oath and
10 you should wait until I finish a question before you
11 respond, and all that stuff; right?

12 A. Right.

13 MR. GREENE: And we ask in this session that
14 the same stipulations apply that we had previously: that
15 objections are reserved, and the original will be mailed
16 to Armstrong for his corrections, but then it will go
17 directly back to your office.

18 MS. BARTILSON: I do have one problem with
19 the second part. I was discussing this with the court
20 reporter earlier.

21 They have a policy that if the original goes
22 to the deponent for signature and the deponent does not
23 order a copy of the deposition, that they'll charge me
24 for two copies, on the theory that you will take a copy
25 of the original.

1 So, if you agree now to order a copy from
2 the court reporter, and you do that, then it's fine to
3 send the original to Mr. Armstrong for signature.
4 Otherwise, I will have to ask him to go to the court
5 reporter's office to sign.

6 THE WITNESS: I will not go to the court
7 reporter's office, so I think that your only solution is
8 to go along with the court reporter's request.

9 MS. BARTILSON: I'm not going to pay for two
10 copies of the deposition, Gerry. If you want a copy of
11 it, you'll have to pay for it. And the statute requires
12 you to go to the court reporter's office to sign it if we
13 can't agree on a stipulation.

14 MR. GREENE: We'll have to work it out
15 later.

16 But how about as to the objections?

17 MS. BARTILSON: As to the objections, it's
18 fine.

19 - THE WITNESS: Well, I don't think we should
20 work it out later, because that would be a great waste of
21 everyone's time because I won't go to the court
22 reporter's office.

23 MS. BARTILSON: Q. Then you will be waiving
24 your opportunity to read and sign the deposition. That's
25 fine. It's up to you.

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF MARIN

--oOo--

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation,

**CERTIFIED
COPY**

Plaintiff,

vs.

No. BC 052395

Gerald Armstrong; Does 1-25,
inclusive,

Defendants.

RECEIVED

NOV 10 1992

HUB LAW OFFICES

DEPOSITION OF
GERALD ARMSTRONG

Thursday, October 8, 1992

VOLUME IV

REPORTED BY: BARBARA H. STOCKFORD, CSR No. 4575

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

EXAMINATION BY: PAGE

MS. BARTILSON 4
--oOo--

EXHIBITS FOR IDENTIFICATION

NO. DESCRIPTION PAGE

15 Two-page document entitled "Proof of Service" 444

16 Two-page document entitled "Proof of Service" 444

17 Amended Notice of Taking the Deposition of Defendant Gerald Armstrong 476

--oOo--

--o0o--

1
2 BE IT REMEMBERED that on Thursday, October
3 8, 1992, commencing at the hour of 10:00 a.m. thereof, at
4 235 Montgomery Street, Suite 450, San Francisco,
5 California 94105, before me, Barbara H. Stockford, a
6 Certified Shorthand Reporter, there personally appeared
7 GERALD ARMSTRONG,
8 called as a witness, who, being by me first duly sworn,
9 was thereafter examined and testified as hereinafter set
10 forth.

--o0o--

11
12
13 A P P E A R A N C E S

14
15 BOWLES & MOXON, Attorneys At Law, 6255
16 Sunset Boulevard, Suite 2000, Hollywood, California,
17 90028, represented by LAURIE J. BARTILSON, Attorney at
18 Law, appeared as counsel on behalf of the Plaintiff.

19 HUB LAW OFFICES, 711 Sir Francis Drake
20 Boulevard, San Anselmo, California, 94960, represented by
21 FORD GREENE, Attorney at Law, appeared as counsel on
22 behalf of the Defendants.

23 ALSO PRESENT: MR. MATT WARD, BOWLES &
24 MOXON.

--o0o--

1 documents responsive to that request?

2 A. I have documents in response to parts of it,
3 and the corporation has documents. And my understanding
4 is this is a very difficult paragraph to understand; that
5 the corporation has some documents which, if I read it
6 right, refer in some way to the Internal Revenue Service.
7 The corporation has corresponded with the Internal
8 Revenue Service.

9 Q. The corporation has literary artistic work
10 which refers or relates to the Internal Revenue Service?

11 A. Correct.

12 Q. But it doesn't have any which refer or
13 relate to your experiences with any of the entities or
14 individuals listed in the settlement agreement?

15 A. Correct.

16 Q. But you have documents?

17 A. Correct.

18 Q. Why don't we take a short break here and we
19 can wrap, Jerry.

20 MR. GREENE: Okay. Sounds fine.

21 (Recess.)

22 MS. BARTILSON: Q. Subject to the
23 motions to compel -- or motion to compel that has been
24 made necessary by some of the objections raised in all
25 the different sections of your deposition, and subject to

1 the possibility that some of the -- I won't say that.
2 Never mind.

3 Subject to the motion to compel, I think I'm
4 ready to conclude your deposition on behalf of plaintiff
5 in this case, Church of Scientology International.

6 Now, do you want to do a stipulation or not?

7 MR. GREENE: Let's see.

8 Yes. I just want to have the stipulation
9 that a copy that we obtain will suffice for review
10 purposes so that Mr. Armstrong need not sally forth to
11 your office, Madam Court Reporter, to conduct a review.

12 MS. BARTILSON: So the court reporter will
13 send to you a copy of the deposition?

14 MR. GREENE: Correct.

15 MS. BARTILSON: Which he may review?

16 MR. GREENE: Right.

17 MS. BARTILSON: How long does he want?

18 MR. GREENE: Standard time. Thirty days.

19 MS. BARTILSON: And copies of the
20 deposition, in the meantime, can be used for any purposes
21 and corrected copies can be used for any purposes in this
22 litigation?

23 MR. GREENE: No, I won't stipulate that
24 copies can be used without limitation for any purpose,
25 because without him having a chance to review it, I won't

1 do that.

2 MS. BARTILSON: Once he's reviewed it?

3 MR. GREENE: Yes, of course. The
4 corrections.

5 MS. BARTILSON: The corrections, once you
6 have completed them, you will forward the corrections to
7 me as I will be the custodian of the original transcript
8 and the corrections.

9 MR. GREENE: Yes, that's fine.

10 MS. BARTILSON: And a corrected transcript
11 can be used for any purposes in this litigation.

12 MR. GREENE: Yeah.

13 MS. BARTILSON: So stipulated.

14 (Deposition concluded.)

15 ---oOo---

16

17

18

19

GERALD ARMSTRONG

20

21

22

23

24

25